

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DESIREE PURVENAS HAYES,

Plaintiff,

v.

**SALTZ, MONGELUZZI & BENDESKY,
P.C.,**

Defendant.

Case No. 2:22-cv-02277-JDW

SCHEDULING ORDER

AND NOW, this 13th day of January, 2025, pursuant to Federal Rule of Civil Procedure 16 and Local Rule of Civil Procedure 16.1(b), it is **ORDERED** as follows.

1. No later than February 26, 2025, counsel for each party shall exchange a list identifying each exhibit the party expects to offer at trial. Each party shall serve (but not file) objections to any exhibits on or before March 26, 2025. The Parties must then meet and confer in good faith in an effort to resolve or narrow objections to proposed exhibits.

2. No later than March 5, 2025, each party shall file a pretrial memorandum. The Parties shall include in their pretrial memoranda all information required by Fed. R. Civ. P. 26(a)(3) and Local Rule of Civil Procedure 16.1, including but not limited to the following:

- a) the identity of each expert witness to be called at trial by the party with a summary of the expert's opinions;
- b) the identity of each fact witness to be called at trial with a concise statement of the nature and substance of the expected testimony (witnesses not listed may not be called by that party in its case-in-chief);
- c) designations, specifically citing those portions by page and line number, of written or video deposition testimony to be offered at trial;
- d) an itemized statement of damages or other relief sought;
- e) a statement of any anticipated important legal issues on which the Court will be required to rule; and
- f) proposed time limits on each side's opening and closing statements and presentation of evidence.

3. All motions *in limine* shall be filed on or before March 12, 2025. Responses, if any, shall be filed no later than March 26, 2025.

4. No later than April 2, 2025, each party shall submit proposed jury questions for *voir dire* via e-mail in Word format to Chambers_of_Judge_Wolson@paed.uscourts.gov with "*voir dire* questions" in the subject line.

5. No later than April 2, 2025, each party shall submit a proposed jury verdict sheet.

6. No later than April 2, 2025, the Parties shall file proposed jury instructions on substantive issues with an electronic copy e-mailed in Word format to Chambers_of_Judge_Wolson@paed.uscourts.gov with "jury instructions" in the subject line. Proposed jury instructions should be submitted as a joint submission, and for any instructions on which the Parties do not agree, plaintiff's proposal shall be in italics and defendant's submission shall be in bold, with citations to the sources of law upon which each proposed instruction is based.

7. On or before April 9, 2025, the Parties shall submit to the Court all exhibits that the Parties intend to use at trial. If the Parties intend to present evidence electronically, then the exhibits shall be submitted electronically (on a memory stick, CD, or DVD) with each exhibit as a separate file. If the Parties do not intend to present evidence electronically, then the exhibits shall be submitted in a binder, with each exhibit separately tabbed. Exhibits shall be consecutively numbered (*i.e.*, Ex. 1, Ex. 2, etc., rather than P-1, P-2, etc. and D-1, D-2, etc.), and the Parties must confer in advance of the submission to eliminate duplication in the exhibits that they submit. The exhibits must be accompanied by a table of contents that lists each exhibit and sets forth whether there is an objection to the admission of the document in evidence at the trial and the basis for any such objection.

8. On or before April 9, 2025, the Parties shall submit to the Court all deposition transcripts corresponding to the Parties' deposition designations. Parties are not required to submit transcripts that will be used at trial solely for impeachment;

9. A final pretrial conference will be held on April 16, 2025, at 10:00 a.m. in Chambers Room 12613, United States District Court, 601 Market Street, Philadelphia, PA 19106. Counsel shall be prepared to discuss any pending motions *in limine*, objections to witnesses, exhibits, deposition designations, time limits, and any stipulations of uncontested facts;

10. A Jury Trial is scheduled for April 22, 2025, at 9:30 a.m. in Courtroom 12B, United States District Court, 601 Market Street, Philadelphia, PA 19106.

BY THE COURT:

/s/ Joshua D. Wolson

JOSHUA D. WOLSON, J.